

Interrogatory No. 4: Describe in detail each use by Iron-IQ of the CygNet® SCADA platform version 9.6 downloaded on August 18, 2023, by Damon Baillie.

Interrogatory No. 5: Identify all customers that Iron-IQ has migrated from Iron-IQ's SCADA platform from Weatherford's CygNet® SCADA platform in the last three years.

Document Request No. 1: Produce all documents and/or ESI related to Interrogatories Nos. 1-5.

Then, within five days of producing verified interrogatory responses and production of documents, Iron IQ shall make CEO Michael Ligrani and employee Damon Baillie available for deposition under Fed. R. Civ. P. 30(b)(1), and shall make one or more corporate representatives available for deposition to testify under Fed. R. Civ. P. 30(b)(6) on behalf of Iron IQ on the following topics:

Deposition Topic No. 1: Information sought in Weatherford's August 30, 2023 correspondence (*see* Verified Complaint at Ex. 6).

Deposition Topic No. 2: Iron-IQ's responses to Interrogatories Nos. 1-5.

Deposition Topic No. 3: Documents produced by Iron-IQ in response to Interrogatories Nos. 1-5 or Document Request No. 1.

SIGNED at Houston, Texas, this ____ day of September 2023.

KENNETH M. HOYT
UNITED STATES DISTRICT JUDGE